

CAUSE NO. 07-CV 1040

DORIS POWLEDGE, INDIVIDUALLY	§	IN THE DISTRICT COURT
AND AS REPRESENTATIVE OF THE	§	
ESTATE OF ADAM POWLEDGE,	§	
DECEASED, THE ESTATE OF RACHEL	§	
POWLEDGE, DECEASED, THE ESTATE	§	
OF ISAAC POWLEDGE, DECEASED,	§	
THE ESTATE OF CHRISTIAN	§	
POWLEDGE, DECEASED, AND THE	§	
ESTATE OF JACOB POWLEDGE,	§	
DECEASED;	§	
AND CONNIE MCNEIL AS NEXT	§	
FRIEND TO AUSTIN POWLEDGE,	§	
A MINOR;	§	
AND AMBER POWLEDGE	§	
AND MARY LOU POWLEDGE,	§	
INDIVIDUALLY,	§	
	§	
Plaintiffs,	§	
	§	
and	§	
	§	
RONALD ALTON POWLEDGE,	§	
	§	
Intervenor,	§	
	§	
VS.	§	10 th JUDICIAL DISTRICT
	§	
GENERAL MOTORS CORPORATION,	§	
	§	
Defendant.	§	GALVESTON COUNTY, TEXAS

PLAINTIFFS' SIXTH SET OF REQUESTS FOR PRODUCTION TO
DEFENDANT GENERAL MOTORS CORPORATION

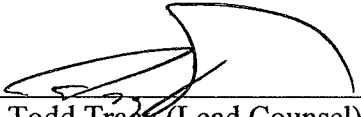
TO: Defendant, General Motors Corporation, by and through its attorneys of record, Kyle H. Dreyer and Jeffrey J. Cox, of Hartline, Dacus, Barger, Dreyer & Kern, LLP, 6688 North Central Expressway, Suite 1000, Dallas, Texas 75206.

In accordance with and pursuant to the Texas Rules of Civil Procedure, Plaintiffs request that Defendant produce for discovery the documents and items specified below on or before thirty (30) days after the date of service hereof. Said items or copies of same

are to be produced at the offices of The TRACY firm, 5473 Blair Road, Suite 200, Dallas, Texas 75231, or at some other reasonable and mutually agreeable location in accord with the Texas Rules of Civil Procedure. These Requests for Production shall be deemed continuing, and supplemental responses are required if Defendant or any representative of Defendant, including its attorneys, agents, or investigators, either directly or indirectly, obtain further information of the nature sought herein between the time of its responses and the time of trial.

Respectfully submitted,

The TRACY firm




E. Todd Tracy (Lead Counsel)
State Bar No. 20178650
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(214) 324-9000 Phone
(972) 387-2205 Fax

ATTORNEYS FOR PLAINTIFFS

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing instrument has been forwarded to all counsel of record on this 3rd day of July, 2008.



E. Todd Tracy
Andrew G. Counts

REQUESTS FOR PRODUCTION

REQUEST FOR PRODUCTION NO. 1: Furnish all documents (if any) related to any investigation conducted by General Motors Corporation, or any of its subsidiaries, within the last ten (10) years, related to any vehicle that may have experienced a cruise control-related unwanted acceleration, sudden acceleration, uncontrolled acceleration, or by whatever name called.

RESPONSE:

REQUEST FOR PRODUCTION NO. 2: Furnish all testing Defendant has undertaken to determine if the Ecotec engine, at full throttle, will overpower the brakes.

RESPONSE:

REQUEST FOR PRODUCTION NO. 3: Furnish all testing to determine if any size engine will overpower a vehicle's brake capacity/capability.

RESPONSE:

REQUEST FOR PRODUCTION NO. 4: Furnish all DFMA, FMEA, fault tree analysis, or by whatever name called for the following components of the subject vehicle:

- a. brake system;
- b. throttle body;
- c. cruise control

RESPONSE: